

ATTACHMENT 1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)
BellUSA, LLC)
Application for Authority Pursuant to Section)
214 of the Communications Act of 1934,)
as amended, to Resell Service of Other) File No. _____
Common Carriers to Provide Telecommunications)
Services as Non-Dominant Carrier from the)
United States to International Points)

BellUSA, LLC (“**BellUSA**”) attests to its qualification for streamlined processing under 63.12 as follows:

- a) **BellUSA** is not a foreign carrier, nor does it control a foreign carrier as defined in Section 63.09(d), in any destination market.
- b) No two or more foreign carriers, or parties that control foreign carriers, own more than 25% of **BellUSA**, or are parties to or beneficiaries of a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.
- c) No owner of **BellUSA** controls a foreign carrier in any country.
- d) **BellUSA** has no affiliation with a dominant US carrier whose international switched or private line services which **BellUSA** seeks authority to resell.
- e) **BellUSA** seeks authority to provide switched basic services over private lines only to countries for which the Commission has previously authorized the provision of switched services over private lines.

BellUSA, LLC seeks authority to provide switched services over private lines pursuant to 63.16 as follows:

BellUSA will only provide switched basic services over its authorized private lines if the country at the foreign end of the private line appears on the Commission list of destinations to which the Commission has authorized the provision of switched services over private lines. **BellUSA** does not seek to add a foreign market to the Commission’s list at this time.

BellUSA responds to 63.18 (d), (e)4 and (g) as follows:

- (d) **BellUSA** has not received previous authority under Section 214.
- (e)4 **BellUSA** requests Section 214 Authority to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2).
- (g) **BellUSA** does not seek facilities-based authority as defined by Section 1.1306, therefore no environmental assessment as described in Section 1.1311 is applicable.